THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ADREA, LLC,

Plaintiff,

v.

BARNES & NOBLE, INC., BARNESANDNOBLE.COM LLC, and NOOK MEDIA LLC,

Defendants.

Civil Action No. 13-cv-4137 (JSR)

NOTICE OF PLAINTIFF'S MOTIONS IN LIMINE

PLEASE TAKE NOTICE that pursuant to Rule 9 of the Individual Rules of Practice of the Honorable Jed. S. Rakoff, Plaintiff, Adrea, LLC ("Adrea") moves this Court for an order precluding Barnes & Noble, Inc., barnesandnoble.com LLC, and Nook Media LLC (collectively, "Defendants") from introducing certain evidence and argument at trial.

In support of these motions *in limine*, Adrea relies upon this Notice of Motion, its Memorandum of Law in Support of Plaintiff's Motions *in Limine*, the Declaration of Colin Cabral and exhibits attached thereto, all prior pleadings on file in this action, any matter judicially noticeable, and all other documents and matters as may be presented to the Court.

A copy of this motion was served on all parties on June 8, 2016. Pursuant to the case schedule, Defendants' opposition, if any, is due no later than Monday, June 15, 2016.

Dated: June 8, 2016 Respectfully submitted,

/s/ Colin Cabral

Steven M. Bauer
Brendan Cox (*pro hac vice*)
PROSKAUER ROSE LLP
One International Place
Boston, Massachusetts 02110
(617) 526-9600 (telephone)
(617) 526-9800 (facsimile)
sbauer@proskauer.com
bcox@proskauer.com

Colin Cabral PROSKAUER ROSE LLP 2049 Century Park East, Suite 3200 Los Angeles, CA 90067 (310) 284-5611 (telephone) (310) 557-2193 (facsimile) ccabral@proskauer.com

Attorneys for Plaintiff ADREA, LLC

CERTIFICATE OF SERVICE

I certify that on June 8, 2016, I caused a copy of the foregoing document to be served upon counsel of record for Barnes & Noble, Inc., barnesandnoble.com llc, and Nook Media LLC by electronic mail.

Louis S. Ederer
Susan Lee Shin
Maxwell Charles Preston
Julie Simeone
ARNOLD & PORTER LLP
399 Park Avenue
New York, NY 10022-4690
Telephone: (212) 715-1000
Facsimile: (212) 715-1399
louis.ederer@aporter.com
susan.shin@aporter.com
maxwell.preston@aporter.com
julie.simeone@aporter.com

Attorneys for Defendants Barnes & Noble, Inc., barnesandnoble.com llc, and Nook Media LLC

/s/ Colin Cabral